

1 and representation in connection with the acquisition of a firearm(s) which was intended
2 and likely to deceive Baseline Pawn, a federal firearms licensee licensed under the
3 provisions of Chapter 44 of Title 18, United States Code, as to a fact material to the
4 lawfulness of a sale of a firearm(s) by the business, with respect to information required by
5 the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of
6 Baseline Pawn, in that this person did execute a Department of Justice, Bureau of Alcohol,
7 Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, stating they
8 were the actual transferee/buyer, whereas in truth in fact, they were purchasing the
9 firearm(s) on behalf of another person.

10 In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

11 **COUNT 2**

12 On or about February 22, 2025, in the District of Arizona, Defendants, MARIO
13 DANIEL BECERRA and FREDDY GRANADO, did ship, transport, transfer, cause to be
14 transported, and otherwise dispose of a firearm, to wit: a Fabrique Nationale Herstal
15 M249S, 5.56x45mm, semi-automatic rifle, serial number M249SA11537, in or otherwise
16 affecting interstate or foreign commerce, to a person, who Defendants, MARIO DANIEL
17 BECERRA and FREDDY GRANADO, knew or had reasonable cause to believe that the
18 person's use, carrying, or possession of the firearm would constitute a felony, to wit: United
19 States Code, Section 922(g)(1), Felon in Possession of a Firearm, and Arizona Revised
20 Statute (A.R.S.) § 13-3102(A)(4), Misconduct Involving Weapons.

21 In violation of Title 18, United States Code, Sections 933(a)(1) and 933(b).

22 **COUNT 3**

23 On or about February 22, 2025, in the District of Arizona, Defendants, MARIO
24 DANIEL BECERRA and FREDDY GRANADO, aided and abetted a person, who
25 knowingly made a false statement and representation in connection with the acquisition of
26 a firearm which was intended and likely to deceive Baseline Pawn, a federal firearms
27 licensee licensed under the provisions of Chapter 44 of Title 18, United States Code, as to
28 a fact material to the lawfulness of a sale of a firearm by the business, with respect to

1 information required by the provisions of Chapter 44 of Title 18, United States Code, to be
2 kept in the records of Baseline Pawn, in that this person did execute a Department of
3 Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms
4 Transaction Record, stating they were the actual transferee/buyer, whereas in truth in fact,
5 they were purchasing the firearm on behalf of another person.

6 In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

7 **COUNT 4**

8 On or about March 27, 2025, in the District of Arizona, Defendant, MARIO
9 DANIEL BECERRA, aided and abetted a person, who knowingly purchased a firearm, to
10 wit: a Barrett M82A1, .50 caliber, semi-automatic rifle, serial number AA019136, in or
11 otherwise affecting interstate or foreign commerce for, on behalf of, and at the request and
12 demand of another person, knowing or having reasonable cause to believe that the other
13 person had previously been convicted in any court of a crime punishable by imprisonment
14 for a term exceeding one year.

15 In violation of Title 18, United States Code, Sections 932(b)(1), 932(c)(1), and 2.

16 **COUNT 5**

17 On or about March 27, 2025, in the District of Arizona, Defendant, MARIO
18 DANIEL BECERRA, aided and abetted a person, who knowingly made a false statement
19 and representation in connection with the acquisition of a firearm which was intended and
20 likely to deceive Baseline Pawn, a federal firearms licensee licensed under the provisions
21 of Chapter 44 of Title 18, United States Code, as to a fact material to the lawfulness of a
22 sale of a firearm by the business, with respect to information required by the provisions of
23 Chapter 44 of Title 18, United States Code, to be kept in the records of Baseline Pawn, in
24 that this person did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms
25 and Explosives Form 4473, Firearms Transaction Record, stating they were the actual
26 transferee/buyer, whereas in truth in fact, they were purchasing the firearm on behalf of
27 another person.

28 In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

FORFEITURE ALLEGATION

The Grand Jury realleges and incorporates the allegations of Counts 1 through 5 of this Indictment, which are incorporated by reference as though fully set forth herein.

Pursuant to 18 U.S.C. §§ 924(d) and 981, 21 U.S.C. §§ 853 and 881, and 28 U.S.C. § 2461(c), and upon conviction of the offenses alleged in Counts 1 – 5 of this Indictment, the defendant shall forfeit to the United States of America all right, title, and interest in (a) any property constituting, or derived from, any proceeds the persons obtained, directly or indirectly, as the result of the offense, and (b) any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense as to which property the defendants is liable. If any forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence,
 - (2) has been transferred or sold to, or deposited with, a third party,
 - (3) has been placed beyond the jurisdiction of the court,
 - (4) has been substantially diminished in value, or
 - (5) has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of said defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

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All in accordance with Title 18, United States Code, Sections 924(d) and 981, Title 21, United States Code, Sections 853 and 881, Title 28, United States Code, Section 2461(c), and Rule 32.2, Federal Rules of Criminal Procedure.

A TRUE BILL

s/
FOREPERSON OF THE GRAND JURY
Date: April 22, 2025

TIMOTHY COURHCAINE
United States Attorney
District of Arizona

s/
MARCUS SHAND
Assistant U.S. Attorney